UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, Plaintiff, v. APPROXIMATELY 225,364,961 USDT Defendant, in rem.	Civil Action No. 25-cv-01907-AHA

NOTICE OF ERRATA TO CLAIMANT'S STATUS REPORT (DOC. 102) AND DECLARATION (DOC. 102-1)

Claimant Nivedita Kaul gives notice of clerical corrections to her Status Report (Doc. 102) and the declaration filed with it (Doc. 102-1). Three concern references in Doc. 102 to Exhibits F to H, which were not filed. One corrects a typographical date error in the declaration.

1. Before filing, Claimant decided to cite three Turkish-language public sources in footnotes rather than attach them as Exhibits F, G and H, as she had intended: the Anadolu Agency report of July 10, 2026, as published by Habertürk; the Türkiye Gazetesi report of July 10, 2026; and the public statement of Türkiye's Minister of Justice, Akın Gürlek, posted on X on September 18, 2026. Each is cited by its source, date and web address (Doc. 102 at 11 n.3, 26 n.5, 27 nn.6-7).

2. No Exhibit F, G or H was filed. Doc. 102 has five exhibits, Exhibits A to E (Docs. 102-2 to 102-6), together with Claimant's declaration (Doc. 102-1).

3. Three references to Exhibits F to H were not conformed to that change. They are corrected as follows:

(a) Doc. 102 at 4, ¶ 6. The sentence "Exhibits A, B, D and F to H are public reports and statements." should read: "Exhibits A, B and D, and the Turkish sources cited in footnotes 3 and 5 to 7, are public reports and statements."

(b) Doc. 102 at 26, the heading of Part III.E (and the corresponding PDF bookmark). "E. Continuing Turkish prosecution and enforcement (Exhibits F to H)" should read: "E. Continuing Turkish prosecution and enforcement".

(c) Doc. 102 at 34, the first entry of the Exhibit Index (and the corresponding PDF bookmark). "Declaration of Nivedita Kaul as to Exhibits A to D and F to H (filed as the first attachment)" should read: "Declaration of Nivedita Kaul (filed as the first attachment)".

4. Declaration, Doc. 102-1 at ¶ 2(b). The declaration states that the screenshot reproduced as Exhibit B was taken "on September 23, 2023 at 6 PM." The year is a typographical error: the screenshot was taken on September 23, 2026, at 6:10 PM, as reflected in Doc. 102. The same comment is independently attested under oath by Roger Welte: he attests that he posted it on September 23, 2026 (Doc. 102-6 at ¶ 18) and that "the comment shown in Exhibit B to Ms. Kaul's status report is mine" (Doc. 102-6 at ¶ 21). This correction is clerical and does not affect any fact attested in either declaration.

5. These corrections are clerical and do not alter the substance of Doc. 102 or Doc. 102-1. The Turkish sources remain cited in footnotes 3 and 5 to 7. Except for the corrections in paragraphs 3 and 4, nothing in this notice withdraws, narrows or concedes any statement, position or request in Doc. 102, Doc. 102-1, or in any other filing by Claimant.

Dated: October 6, 2026

Respectfully submitted,

/s/ Nivedita Kaul

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 6, 2026, the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel and parties of record.

Dated: October 6, 2026

Respectfully submitted,

/s/ Nivedita Kaul
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